

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

IN RE SANDRIDGE ENERGY,
INC. SECURITIES LITIGATION

Case No. 5:12-cv-01341-W

Relating to All Actions

**DECLARATION OF MARK P. GIMBEL IN SUPPORT OF
DEFENDANTS' OPPOSITION TO PLAINTIFFS' MOTION
FOR CLASS CERTIFICATION**

I, Mark P. Gimbel, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am a member of Covington & Burling LLP, which serves as counsel to defendants James D. Bennett and Matthew K. Grubb in this action. I have been admitted pro hac vice in this action.

2. I provide this declaration to submit certain exhibits cited in Defendants' Brief in Opposition to Plaintiffs' Motion for Class Certification.

3. Attached as Exhibit 1 is a true and correct copy of excerpts from the deposition of James Mace, taken on April 19, 2018.

4. Attached as Exhibit 2 is a true and correct copy of the retainer agreement for portfolio monitoring between Laborers Pension Trust Fund for Northern Nevada and Milberg Weiss Bershad Hynes & Lerach LLP, dated January 12, 2004.

5. Attached as Exhibit 3 is a true and correct copy of excerpts from the deposition of Don Willey, taken on April 25, 2018.

6. Attached as Exhibit 4 is a true and correct copy of the retainer agreement for portfolio monitoring between Laborers Pension Trust of Greater St. Louis and Lerach Coughlin Stoia & Robbins LLP, dated July 29, 2004.

7. Attached as Exhibit 5 is a true and correct copy of the engagement agreement for portfolio monitoring between Laborers Pension Trust of Greater St. Louis and Robbins Geller Rudman & Dowd LLP, dated April 23, 2013.

8. Attached as Exhibit 6 is a true and correct copy of excerpts from Lead Plaintiffs' Responses and Objections to Defendants James D. Bennett and Matthew K. Grubb's First Set of Interrogatories, dated January 19, 2018.

9. Attached as Exhibit 7 is a true and correct copy of the memorandum and order of dismissal from *In re ATI Technologies, Inc. Securities Litigation*, No. 2:05-cv-04414-TON (E.D. Pa. Aug. 8, 2007).

10. Attached as Exhibit 8 is a true and correct copy of the memorandum and order of dismissal from *In re Daktronics Inc. Securities Litigation*, No. 4:08-cv-04176-LLP (S.S.D. July 13, 2010).

11. Attached as Exhibit 9 is a true and correct copy of the memorandum and order of dismissal from *In re Harley Davidson, Inc. Securities Litigation*, No. 2:05-cv-0547-CNC (E.D. Wis. Oct. 8, 2009).

12. Attached as Exhibit 10 is a true and correct copy of the memorandum and order of dismissal from *In re Neurocrine Biosciences, Inc. Securities Litigation*, No. 3:07-cv-01111-IEG-RBB (S.D. Cal. Oct. 23, 2008).

13. Attached as Exhibit 11 is a true and correct copy of the opinion and order of dismissal from *Ong v. Chipotle Mexican Grill, Inc.*, No. 1:16-cv-00141-KPF (S.D.N.Y. Mar. 22, 2018).

14. Attached as Exhibit 12 is a true and correct copy of excerpts from the deposition of Vladimir Galkin, taken on April 20, 2018.

15. Attached as Exhibit 13 is a true and correct copy of excerpts from the deposition of Angelica Galkin, taken on April 25, 2018.

16. Attached as Exhibit 14 is a true and correct copy of excerpts from the deposition of Bjorn Steinholt, taken on May 3, 2018.

17. Attached as Exhibit 15 is a true and correct copy of a table summarizing the ratio of oil to gas prices in 2012 and supporting data obtained from the United States Energy Information Administration. *See, e.g., Garling v. United States Envtl. Prot. Agency*, 849 F.3d 1289, 1297 n.4 (10th Cir. 2017) (taking judicial notice of facts reported by a federal agency on its official website).

18. Attached as Exhibit 16 is a true and correct copy of excerpts from the Form 10-K filed with the United States Securities and Exchange Commission by SandRidge Energy, Inc. for the fiscal year ending December 31, 2011.

19. Attached as Exhibit 17 is a true and correct copy of excerpts from the Form 10-K filed with the United States Securities and Exchange Commission by SandRidge Energy, Inc. for the fiscal year ending December 31, 2012.

20. Attached as Exhibit 18 is a true and correct copy of the Analyst Report regarding SandRidge Energy Inc. prepared by BNP Paribas Securities Corp. (US) on February 15, 2012, bates labeled CAL0001410-1423.

21. Attached as Exhibit 19 is a true and correct copy of the Analyst Report regarding SandRidge Energy Inc. prepared by J.P. Morgan Chase & Co. on November 16, 2012, bates labeled CAL0000645-662.

22. Attached as Exhibit 20 is a true and correct copy of an email exchange discussing publicly available well data between James Mullins and Ken Carroll dated November 4, 2011, bates labeled DLC_000025.

23. Attached as Exhibit 21 are true and correct copies of E*Trade Platinum investment account statements with account number ending in 2335 for the time period of April 2011 through March 2013.

Executed on June 1, 2018 in New York, New York.

/s/ Mark P. Gimbel
Mark P. Gimbel

CERTIFICATE OF SERVICE

I hereby certify that on June 1, 2018, I electronically transmitted the attached document to the Clerk of the Court using the ECF system for filing, which will send notification of such filing to all counsel registered through the ECF System.

/s/ Thomas B. Snyder
Thomas B. Snyder